

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
WEST VIRGINIA, AT MARTINSBURG**

**DALE BERNARD BEARD, JR.,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 3:23-CV-193  
HONORABLE GINA GROH**

**DANIEL E. SMITH, individually, and  
ADAM ALBAUGH, individually,**

**Defendants.**

**STIPULATION TO EXTEND DEADLINES**

COMES NOW, Defendants Daniel E. Smith and Adam Albaugh, by counsel, Keith C. Gamble, Esq. and the law firm of Pullin, Fowler, Flanagan, Brown & Poe, PLLC, and advises this honorable Court that due to a delay in obtaining deposition transcripts of the depositions that took place on August 29, 2024, the parties need to extend the following deadlines:

The discovery deadline be extended to October 11, 2024;

The Defendant's Expert Disclosure deadline be extended to September 30, 2024;

Dispositive Motions deadline to be extended to October 25, 2004. Responses be extended to November 1, 2024, and Replies be extended to November 8, 2024.

**IT IS HEREBY STIPULATED AND AGREED** that the above referenced deadlines be extended. Any and all other deadlines not mentioned herein that are contained in the November 29, 2023, Scheduling Order [ECF. 8] remain unchanged unless stipulated to or requested of the Court.

**Prepared by:**

/s/ Keith C. Gamble

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**Approved by:**

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